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8 COUNTY OF LOS ANGELES,  
COUNTY OF LOS ANGELES  
9 SHERIFF'S DEPARTMENT, SHERIFF  
JIM MCDONNELL, LAUREN BROWN,  
10 JAMES MURREN, DONALD YOUNG

11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA

13  
14 LAMONT TARKINGTON,  
15 Plaintiff,  
16 vs.  
17 COUNTY OF LOS ANGELES, *et al.*  
18 Defendants.

Case No. 2:18-CV-07636-CJC-JCx  
[Hon. Cormac J. Carney]

**DEFENDANTS' OPPOSITION TO  
PLAINTIFF'S EX PARTE  
APPLICATION TO ENFORCE  
SETTLEMENT AGREEMENT**

Date: TBD  
Time: 1:30 p.m.  
Ctrm: 9B  
Judge: Hon. Cormac J. Carney

1 Defendants County of Los Angeles (the “County”), Los Angeles County  
2 Sheriff’s Department (“LASD”), Sheriff Jim McDonnell, Lauren Brown, James,  
3 Murren, and Donald Young (collectively, “Defendants”) hereby oppose Plaintiff’s  
4 Ex Parte Application to Enforce Settlement Agreement, filed by Plaintiff Lamont  
5 Tarkington (“Plaintiff”) at 3:54 pm on Friday, August 28, 2020. *See* Dkt. 153.

6 Throughout this process, Plaintiff has attempted to impose deadlines not  
7 contemplated by the parties when they entered in the conditional settlement. While  
8 Plaintiff has accused the County of delay, despite the significant disruption caused  
9 by the COVID-19 pandemic, the County presented the conditional settlement for  
10 approval within the typical window for approval by the Board of Supervisors—six  
11 to eight months.

12 Furthermore, in connection with Plaintiff’s first motion to enforce the  
13 settlement, the County outlined the process for approval by the Board of  
14 Supervisors, including anticipated timelines for each step. *See* Dkt. 147. At each  
15 step in the process, the County has worked diligently to satisfy the various timelines  
16 communicated to Plaintiff, and to the Court. On June 29, 2020, when the County  
17 filed its opposition, Dkt. 147, the County indicated that a hearing before the Claims  
18 Board was set for July 6; the hearing went forward as scheduled and the settlement  
19 moved on to the next step. At the July 20 hearing on Plaintiff’s motion, Defendants’  
20 counsel advised the Court that the County expected the settlement to be presented to  
21 Board of Supervisors within two weeks of the hearing. Consistent with counsel’s  
22 representation at the July 20 hearing, the Board of Supervisors considered and  
23 approved the settlement on August 4, 2020.

24 Once the settlement was approved by the Board of Supervisors, the County  
25 initiated the process to have the settlement check cut. On August 19, 2020, in  
26 response to Plaintiff’s counsel’s inquiry, Defendants’ counsel informed Plaintiff’s  
27 counsel that it would take two more weeks for the check to be cut. As of this  
28 writing, the County believes that the check will be available within the two week

1 timeframe it communicated to Plaintiff's counsel on August 19.

2 The County continues to work diligently to shepherd this settlement through  
3 its internal processes and controls; this process is coming to a close. Accordingly,  
4 Defendants respectfully request that the Court deny Plaintiff's Ex Parte Application<sup>1</sup>  
5 in its entirety.

6 Dated: August 29, 2020

LARSON O'BRIEN LLP

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8  
9 By: s/A. Alexander Lowder

Stephen G. Larson

Koren L. Bell

A. Alexander Lowder

10 Attorneys for Defendants COUNTY OF LOS  
11 ANGELES; COUNTY OF LOS ANGELES  
12 SHERIFF'S DEPARTMENT; SHERIFF JIM  
13 MCDONNELL; LAUREN BROWN; JAMES  
14 MURREN; DONALD YOUNG  
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27 <sup>1</sup> Defendants note that Plaintiff fails to cite any authority for his request for interest,  
28 attorney's fees, or costs associated with his recent submissions.